

1 THE HONORABLE TANA LIN
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

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11 JESSE G. COOPER, in his Personal Capacity
12 and as Personal Representative of the Estate of
13 PAULA LEE JEFFERSON, deceased; *et al.*,

14 Plaintiffs,

15 v.

16 WHATCOM COUNTY, a political subdivision
17 of the State of Washington; *et al.*,

Defendants.

CASE NO. 2:20-cv-01196-TL

**STIPULATED MOTION AND
AGREED ORDER TO EXTEND
DEADLINE FOR COMPLETING
MEDIATION UNDER LOCAL CIVIL
RULE 39.1**

NOTE ON MOTION CALENDAR:
FEBRUARY 10, 2022

18 Pursuant to Fed. R. Civ. P. 16(b)(4), Plaintiffs and Defendants, through counsel,
19 (collectively the "Parties") jointly stipulate and agree as follows:

20 1. On August 23, 2021, the Court issued a Minute Order setting the deadline for Rule
21 39.1 mediation to be completed by February 11, 2022. Dkt. # 80.

22 2. In November of 2021 the Parties began searching for an agreed-upon mediator to
23 conduct mediation in this case. The Parties agreed upon mediator Keith Kubik, some of the parties

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25 STIPULATED MOTION AND AGREED ORDER TO EXTEND
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1 having successfully mediated cases with Mr. Kubik in the past. Because of demand for Mr. Kubik,
2 however, his calendar was booked up for months in advance.

3. The Parties are currently scheduled to mediate with Mr. Kubik on March 7, 2022.
4 Thus, the Parties respectfully request that the Rule 39.1 mediation deadline be modified to
5 accommodate the currently scheduled March 7, 2022, mediation.

6 DATED this 10th day of February, 2022.

7 IT IS SO STIPULATED:

8 GALANDA BROADMAN, PLLC

9 s/Ryan D. Dreveskracht

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17 s/ D. Jeffrey Burnham

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25 s/ John E. Justice

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WHATCOM COUNTY PROSECUTING ATTORNEY

s/ George Roche

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MURPHY PEARSON BRADLEY & FEENEY

s/ Nicholas C. Larson

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ORDER

Pursuant to the Stipulation above, the current case schedule dates are amended as follows:

Rule 39.1 Mediation Deadline: March 7, 2022. The remaining deadlines set in the Court's previous orders will remain the same.

DATED this 10th day of February, 2022.

Tana Lin
Tana Lin
United States District Judge

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CERTIFICATE OF SERVICE

I, Wendy Foster, declare as follows:

1. I am now and at all times herein mentioned a legal and permanent resident of the United States and the State of Washington, over the age of eighteen years, not a party to the above-entitled action, and competent to testify as a witness.

2. I am employed with the law firm of Galanda Broadman PLLC, 8606 35th Avenue NE, Ste. L1, Seattle, WA 98115.

3. I served the foregoing on the following, via the Court's ECF filing system:

George Roche
Whatcom County Prosecutor's Office
311 Grand Avenue Suite 201
Bellingham, WA 98225

Nicholas C. Larson
Jason E. Fellner
Alexandrea M. Tomp
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D. Jeffrey Burnham
925 Fourth Avenue Suite 2300
Seattle, WA 98104

The foregoing statement is made under penalty of perjury and under the laws of the State of Washington and is true and correct.

Signed at Seattle, Washington, this 10th day of February, 2022.

s/Wendy Foster
Wendy Foster

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